

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

STEPHANIE MRAZ,)	CIVIL ACTION
)	
Plaintiff,)	<i>Civil Action No. 05-129</i>
v.)	
)	Judge Sean J. McLaughlin
MR. TILE, INC. and SANFORD)	
COOPERMAN, Individually as owner and)	<u>A JURY TRIAL IS DEMANDED</u>
operator of MR. TILE, INC.)	
)	
Defendants)	

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on September 23, 2005 by conference call and was attended by Edith Sutton, Esquire on behalf of the Plaintiff Stephanie Mraz and Bethann R. Lloyd on behalf of the Defendants Mr. Tile, Inc. and Sanford Cooperman.

2. **Pre-Discovery Disclosures.** The parties will exchange by October 31, 2005 the information required by Federal Rule of Civil Procedure 26(a)(1).

3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan. Discovery will be needed on the following subjects:

Plaintiff: The Plaintiff will need discovery regarding the Plaintiff's personnel records, prior litigation against Defendants, personnel procedures and training at Mr. Tile and treatment of other similarly situated employees.

Defendants: Defendants will need discovery on issues relating to Plaintiff's work history, health and ability to work, communications with her employer and her

claimed injuries.

All discovery commenced in time to be completed by February 28, 2006.

Maximum of 30 interrogatories by each party to any other party.

Maximum of 30 requests for admission by each party to any other party.

Maximum of 5 depositions by plaintiff and 5 by defendants.

Each deposition (other than of Plaintiff) limited to maximum of 2.5 hours unless extended by agreement of parties. Plaintiff limited to 5 hours unless extended by agreement.

Reports from retained experts under Rule 26(a)(2) due:

from plaintiff by March 31, 2006

from defendants by April 28, 2006

Supplementations under Rule 26(e) due May 15, 2006.

4. Other Items

The Court has scheduled a Case Management Conference with the court on November 3, 2005.

The parties request a Pre-Trial Conference in May of 2006.

All potentially dispositive motions should be filed by March 15, 2006.

Plaintiff is in the process of developing a demand.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:

from plaintiff by March 31, 2005

from defendants by April 28, 2006

Parties should file objections to final lists of witnesses and exhibits 7 days prior to the Pre-Trial Conference.

The case should be ready for trial by June 2006 and at this time is expected to take approximately 3 to 4 days.

THE LINDSAY LAW FIRM

/s/ Edith Lynne Sutton
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ATTORNEYS FOR PLAINTIFF,
STEPHANIE MRAZ

Respectfully submitted,
GROGAN GRAFFAM, P.C.

/s/ Bethann R. Lloyd
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ATTORNEYS FOR DEFENDANTS,
MR. TILE, INC. AND SANFORD
COOPERMAN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Report of Parties' Planning Meeting was served upon the following parties of record on this 6th day of October, 2005 by United States mail, first-class, postage prepaid:

Edith Lynne Sutton, Esquire
THE LINDSAY LAW FIRM
128 South Main Street
Butler, PA 16001

/s/ Bethann R. Lloyd
Bethann R. Lloyd, Esquire